

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Umelaila Afsar (Chan Dp) Service Appeal No: 1746/23
M. Afsar (Chan) SST GEMS Buldhri
ATD.

VERSUS

SECRETARY ELEMENTARY & SECONDARY EDUCATION KPK & OTHERS


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Dated: 16-11-2023

Appellant

Through counsels,


Imran Younas Khan Tanoli

Advocates, Peshawar High
court Abbottabad.

1

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

CHECK LIST

S. A. NO - 1748/23

Case Title: Um e baira Afsar D/o M. Afsar Khan

S#	CONTENTS	Yes	No
1.	This Appeal has been presented by		
2.	Whether counsel / appellant / respondent / deponent have signed the requisite document?		
3.	Whether appeal is within time?		
4.	Whether appeal enactment under which the appeal is filed is mentioned?		
5.	Whether enactment under which the appeal is filed is correct?		
6.	Whether affidavit is appended?		
7.	Whether affidavit is duly attested by competent oath commissioner?		
8.	Whether appeal / annexure are properly pagged?		
9.	Whether certificate regarding filling any earlier appeal in the subject, furnished?		
10.	Whether annexures are legible?		
11.	Whether annexures are attested?		
12.	Whether copies of annexures are readable/ clear?		
13.	Whether copies of appeal is delivered to AG/ DAG?		
14.	Whether Power of Attorney of the counsel engaged is attested and signed by Petitioner/ Appellant/ Respondents?		
15.	Whether number of referred cases given are correct?		
16.	Whether appeal contains cutting / overwriting?		
17.	Whether list of books has been provided at the end of the appeal?		
18.	Whether case relate to this Court?		
19.	Whether requisite number of spare copies are attached?		
20.	Whether complete spare copy is filed in separate file cover?		
21.	Whether addresses of parties given are completed?		
22.	Whether index filed?		
23.	Whether index is correct?		
24.	Whether security and process fee deposited? On _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rule 1974 rule 11, Notice along with copy of appeal and annexure has been sent to respondents? On _____		
26.	Whether copies of comments / replay/ rejoinder submitted? On _____		
27.	Whether copies of comments / replay/ rejoinder provided to opposite party? On _____		

It is certified that formalities /documentations as required in the above table, have been fulfilled.

Name: Murad Yousaf Tareeli Adv
 Counsel for Appellant
 Signature: - Murad Yousaf
 Dated: - 16-11-2023

(2)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

S.A. NO 1748/23

Ume Laila Afsar D/o Muhammad Afsar Khan, Abbottabad
.....Appellant

Versus

Secretary Elementary and Secondary Education KPK Peshawar & others Sakhtunkhwa Service Tribunal

Diary No. 9260

Dated 20-11-23

SERVICE APPEAL

APPLICATION FOR PERMISSION TO FURTHER DOCUMENTS/PLACE ON RECORD NECESSARY DOCUMENTS PERTINING TO THE INSTANT APPEAL.

Respectfully Sheweth;

1. That instant appeal titled above has been filed before the Hon'ble Tribunal.
2. That the appellant seeks permission to place on record of the instant case following documents.
 - a. Recommendation of the KPK PCS regarding appointment of Appellant as SET/SST as first batch and others.
 - b. Order of the regularization (Act 2009), of the service of respondents (female).
 - c. First page of the service appeal before the prayer be corrected of the clerical mistake as Act 2009 promulgated on 24-10-2009 instead of 24-08-2009 and annexure "C" instead of "A".
 - d. Application for Provision of necessary record from the department according to RTI.
3. That the documents mentioned above are necessary documents for the just fair decision of the case.

It is therefore prayed the appellant may graciously be allowed to further documents/place on record necessary documents for pertaining to instant appeal.

Dated:16-11-2023

Through

Appellant



Imran Younas Khan Tanoli
Advocate, Peshawar High Court
Abbottabad



No. NWFP/PSC/SR-II 39215

Date 15/10/2009

To

The Secretary to Govt of NWFP
Secondary & Elementary Education
Department Peshawar.Subject: RECRUITMENT OF FEMALE S.E.I.s (B-16) (EARTH QUAKE QUOTA) ADVT. NO. 01/2009
Sir.

I am directed to refer to our letter No. SO(S)3-2/2007/Req dated 23.10.2008 on the subject noted above and to state that the Commission recommends the following candidates to the Government for appointment:-

S.No.	Merit Order	Name with Father's Name	Priority District
✓ 1.	23	✓ Ayesha Siddiqi D/O Pir Zaman Shah	Battagram
✓ 2.	02	✓ Asiya Bibi D/O Syed Gulzar Shah	Manshra
✓ 3.	01	✓ Fozia Khushal D/O Khushal Khan	Abbottabad
✓ 4.	36	✓ Bibi Hailquis Begum D/O Sher Bahadar	Battagram
✓ 5.	03	✓ Miss Nabila Nawaz D/O Muhammad Nawaz	Manshra
✓ 6.	04	✓ Farhat Jabeen D/O Abdul Khaliq Awan	Abbottabad
✓ 7.	05	✓ Nighat Bibi D/O Muhammad Khan	Manshra
✓ 8.	06	✓ Zaineb Bukhari D/O Syed Inayatullah Shah	Manshra
✓ 9.	07	✓ Asma Ghaffar D/O Abdul Ghaffar Khan	Abbottabad
✓ 10.	09	✓ Salma Noreen D/O Chun Muhammad	Abbottabad

2. Recommendation in favour of the recommendees are provisional subject to passing the prescribed medical test.

3. Original applications (with enclosures) of the above recommendees are enclosed for your record. Please acknowledge receipt.

Yours Faithfully,

(Israr-ud-Din)

Deputy Secretary-I

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OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION NWFP PESHAWAR
APPOINTMENT ORDER

Consequent upon the recommendation/selection by the NWFP, Public Service Commission, the competent authority has been pleased to appoint the following candidates (Barth-quante) against the post of SST in D-16 plus usual allowances as admissible under the rules on regular basis but without pension & gratuity with immediate effect under the provision of Establishment, & Administration Department circular bearing No.SOR-6 (E&A) I-13/2005 dated 10-8-2005 and they are further adjusted as under:-

S.NO	NAME	ZONE	DISTRICT	PLACE OF POSTING
1	Mst. Aynaba Siddiq D/O Pir Zaman Shah (Lato) Noor, Kaghlan Flour Mill, Mohallah upper Channal, Manshara	V	Battagram	GGHS, Kaghlan, Manshara SST (Sc.)
2	Mst. Asiya Bibi D/O Syed Gulzar Shah C/O Shah Baba General Store Near GPO Manshara	V	Manshara	GGHS, Oghi Manshara SST (Sc.)
3	Mst. Fozia Khushal D/O Khushal Khan Teh. & District A-Abad PO Sherwan, Village Pathool.	V	A-Abad	GGHS, Sherwan A-Abad SST (Sc.)
4	Bibi Bilquis Begum D/O Sher Banadir Village & P.O Kuzabanda Teh. & District Battagram C/O Fida Muhammad Mob: No.03010129012	V	Battagram	GGHS, Banian Battagram SST (Sc.)
5	Miss Nabila Nawaz D/O Muhammad Nawaz Village & PO Tarangri Bala, Manshara	V	Manshara	GGHS, Shinkiri Manshara SST (Sc.)
6	Mst. Farhat Jabeen D/O Abdul Khaliq Awan H.No.G-1. P/Colony S.No.1 KTS Haripur	V	A-Abad	GGHS, Tofkian Haripur SST (Sc.)
7	Mst. Nighat Bibi D/O Muhammad Khan C/O Indus Medicos Al Mumtaz Plaza near Qurashi Petrol Pump Supply, Abbottabad	V	Manshara	GGHS, Hajji Gali A-Abad SST (Sc.)
8	Mst. Zaineb Bukhari D/O Syed Inayatullah Shah Mohallah Nagazi near Ziarat Manshara	V	Manshara	GGHS, Shamdarha Manshara SST (Sc.)
9	Mst. Asma Ghaffar D/O Abdul Ghafar Khan Vill: Juhna P/O Chamhathi Via Manshara A-Abad	V	A-Abad	GGHS, Phulgran A-Abad SST (Sc.)
10	Mst. Saima Noreen D/O Chan Muhammad Vill: & PO Sherwah Khurd, Abbottabad	V	A-Abad	GGHS, Pind Kargu Khan A-Abad SST (Sc.)

TERMS & CONDITIONS OF THEIR APPOINTMENTS

- 1- Their services will be considered as regular but without pension/gratuity in term of Section 19 of the NWFP, Civil Servant Act 1973 as amended vide NWFP, Civil Servants (Amendment) Act 2005. They will however be entitled to Contributory Provident Fund (C.P.Fund) in such a manner and at such rate as may be prescribed by the Govt.
- 2- Their services will be liable for termination on one month's prior notice from either side. In case of resignation without prior notice their one month pay/allowances will be forfeited to Govt.
- 3- The appointees should join their posts within one month after the issue of this Notification.
- 4- The Executive Distt. Officer. (Elementary & Secondary Education) concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of this Notification, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
- 5- They would be on probation for a period of two years, extendable for another one year.
- 6- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 7- Their services can be terminated at any time, in case their performance are found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the NWFP, Removal from service (Special Powers) Ordinance 2000 and the Rules framed from time to time.
- 8- Charge report should be submitted to all concerned.
- 9- They will be required to furnish copies of all their certificates/degrees along with the original receipts and photocopies thereof pertaining to the verification fee to the concerned Examining body (Board/University), to the Executive District Officer Elementary & Secondary Education concerned
- 10- Their pay should not be released before verification of documents/degrees.
- 11- No TADA will be allowed to the appointees for joining their duty.

DIRECTOR
 ELEMENTARY & SECONDARY EDUCATION
 N.W.F.P. PESHAWAR

Endst: No. 1970-2001 / F.No.A-17/SET(F)PSC-2009 Dated Peshawar the 21/12/2009.

- 1- PS to Secretary to Govt. of NWFP Elementary & Secondary Education Department Peshawar.
- 2- Secretary to NWFP, Public Service Commission.
- 3-5. Executive District Officer Elementary & Secondary Education, Abbottabad, Manshara, Battagram
- 6-8. District Account Officer, Abbottabad, Manshara, Battagram
- 9-19. Principal/Headmistress concerned
- 20-30. Candidate concerned/Mistress concerned
31. PA to Director of Elementary & Secondary Education NWFP, Local Office

[Handwritten Signature]

[Handwritten Date: 21/12/2009]

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**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**



PH No. 091 92109380, 92109381,
92109377, 92109377, 92109368
Fax 091-9210936
E-mail de@kpk.gov.pk

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Notification.

Consequent upon the recommendation of the Director, Khyber Pakhtunkhwa Public Service Commission, appointment of the following candidates is hereby ordered against the post of Secondary School Teacher Female (SST General) in DPS-16 (Rs.10000-5100-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with immediate effect and their Services are placed at the disposal of EDO(L&SE) concerned for further posting against vacant SST General posts:-

S. #	Name	Father's Name	Domicile	Zone	Permanent Address	Place of posting
1	Ambreen Jilani	Saifur Rehman	Mardan	2	VPO Takkar Moh: Gujran Tehsil Takht Bhal, Mardan	Services placed at the disposal of EDO (E&SE) Mardan for further posting against vacant SST General post.
2	Nighat	Said Karim	Mardan	2	Irum Colony, Nowshera road Mardan	Do
3	Saima Anwar	Anwar Shah	Nowshera	2	Vill: Azakhal Bala Tehsil & Distt: Nowshera	Services placed at the disposal of EDO (E&SE) Nowshera for further posting against vacant SST General post.
4	Irum Butt	Aftab Ahmad Butt	Peshawar	2	H.# 90, Street, 7, Sector K-2, Phase 3, Hayatabad Peshawar	Do
5	Saima	Mudaser Shah	Swabi	2	Moh: Gul Bahar Tehsil & Distt: Swabi	Services placed at the disposal of EDO (E&SE) Swabi for further posting against vacant SST General post.
6	Ayesha Hashim	Muhammad Hashim Khan	Battagram	3	VPO Banian Tehsil & Distt: Battagram	Services placed at the disposal of EDO (E&SE) Battagram for further posting against vacant SST General post.
7	Rashida Rahim Baig	Rahim Baig	Chitral	3	PO Chitral Tehsil & Distt: Chitral Vill: Seenlasht	Services placed at the disposal of EDO (E&SE) Dir Upper for further posting against vacant SST General post.
8	Najma Noureen	Syed Saeed Jan	Dir Lower	3	Vill: Mian Banda Timgara PO & Tehsil Timgara Dir Lower	Services placed at the disposal of EDO (E&SE) Dir Lower for further posting against vacant SST General post.
9	Musarat Begum	Amir Gul	Malakand Agency	3	Vill: Muqam Kali PO Ghawar Kali	Do

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Appointment Order No. 12 SST (G) Adm No 1/2009

Fauzan

10	Seema Nahi	Hayat Nahi	Malakand Agency	1	Sakla Kot, Dargai Malakund Vill, Khinkal PO Dargai Tehsil Dargai Dutt, Malakand	
11	Kahat Naz	Inayat Qazi	Shanglo	1	VPO Chauiga Mohi Ali Khel Tehsil Pura Shanglo	Services placed at the disposal of EDO (L&SE) Shanglo for further posting against vacant SST (Gen) at post
12	Rahima Qazi	S. I Ullah Qazi	Laska Mamour	1	Vill, Daraki Alam Shaki Khel P.O. Serna, Laska Mamour	Services placed at the disposal of EDO (L&SE) Laska Mamour for further posting against vacant SST (Gen) post
13	Shahana Begum	Muhammad Younas Khan	Abbottabad	5	VPO Jhama P.O. Dutt, Abbottabad	Services placed at the disposal of EDO (L&SE) Abbottabad for further posting against vacant SST (Gen) post
14	Gina Latifa Khan	Muhammad Afsar Khan	Abbottabad	5	Hupper Manzil Colony Abbottabad	
15	Sahara Mushal	Muhammad Mushal Khan	Manshra	5	VPO Shahal Naya Khan Mohi, Maldan Tehsil Balakot Distt, Manshra	Services placed at the disposal of EDO (L&SE) Manshra for further posting against vacant SST (Gen) post

*District Education Officer
Ferozpur Abbottabad*

Terms and conditions:-

- 1. Her services will be considered regular but without Pension & Gratuity in terms of NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 1980. She shall be required to contribute to Contributory Provident Fund in such a manner and at such a rate as may be prescribed by the Govt.
- 2. She is already in Government service and working against pensionable post on regular basis since 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Provincial Commission through proper channel and selected by the Commission, in appointment and on the date of appointment either to retain benefit of pension & gratuity as allowed to her under her previous appointment or to avail the benefit of Contributory Provident Fund allowed to her under the present appointment.
- 3. Her services is liable to termination on one month's notice from either side. In case of resignation without notice her one-month pay/allowances shall be forfeited to the Government.
- 4. She should join her post within 30 days of the issuance of this notification. In case of failure to join the post within one month of the issuance of this notification, her appointment will expire automatically and her appeal, if any, shall be entertained.
- 5. She shall be on probation for a period of one year extendable for another one year.
- 6. She shall be governed by the rules and regulations as may be issued from time to time by the Govt.
- 7. She may be terminated at any time, in case her performance is found unsatisfactory during the probation period. In case of irregularities, she shall be proceeded under the rules framed from time to time.

[Signature]

It is hereby certified to the effect that the candidate has joined the post as per the appointment order.

Her seniority shall be maintained as determined by the Commission.

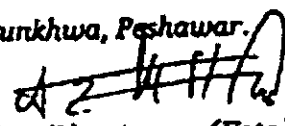
12. No TA/DA will be allowed to the appointee for joining her duty.

(Muhammad Rafiq Khattak)
Director -
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. 315-22 / File No. 2/A-17/SST(F) Genral /PSC/ Apptt: Dated Peshawar the 24/12/21

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. Executive District Officer (E&SE) Concerned
4. District Accounts Officer Concerned
5. Official Concerned.
6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
8. M/File


Dy: Directoress (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar
4/7/21



"B"



OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION NWFP PESHAWAR

NOTIFICATION

The competent authority has been pleased to regularize the services of the following adhoc/contract employees against the post of SST (Female) (BPS-16) with effect from 01-01-2009, under the NWFP Employees (Regularization of Services) Act, 2009 on the terms and conditions give at the end of this Notification.

S.No	Name of candidate	Father's Name	Present Station	Date of Last Appointment Order
PESHAWAR				
1.	Amjad Anjum	Asif Khan	GGHS Budhni	5139-5197 25-11-2008
2.	Nusheen Akhtar	Akhtar Ali	GCMS Charpariza	5139-5197 25-11-2008
NOWSHERA				
3.	Khawaga	Shamsher	GGHS Mohib Banda	5139-5197 25-11-2008
4.	Shandana	Faqir Mohammad	GGMS Zara Maina	5139-5197 16-9-2008
5.	Asma Hanceel	Mohammad Hanceel	GGCMS Mandori	5139-5197 16-09-2008
6.	Kiran Shahzadi	Mian Bahceer Shah	GGHS Spin Khak	5139-5197 25-11-2008
7.	Irum Niaz	Pir Mohammad	GGHS Nowshera Capital	5139-5197 25-11-2008
8.	Shakeela Naz	Mir Rahman	GGHS Bara Banda	5139-5197 25-11-2008
9.	Nusrat Shahceen	Chulam Qadir	GGHS Inzari	5139-5197 16-09-2008
10.	Nazia Habib	Habibullah	GGHS Pabbi	5139-5197 25-11-2008
CHARSADPA				
11.	Fahmeeda	Sheh Mohammad	GGHS Palangani	5139-5197 16-09-2008
12.	Robina Yousaf	Yousaf Khan	GGMS Ganderi	5139-5197 16-09-2008
13.	Bibi Ifalcema	Shahzad	GGHS Boobak	5139-5197 16-09-2008
14.	Roohi Bano	Fazle Rabbani	GGHS Nisatta	5139-5197 16-09-2008
15.	Toushiba Naz	Gul Faraz	GGHSS Harichand	5139-5197 16-09-2008
16.	Fouzia Naz	Farmanullah	GGHSS Harichand	5139-5197 25-11-2008
17.	Shaista Zeb	Mohammad Saib	GGHS Shodag	5139-5197 25-11-2008
18.	Seema Gul	Jan Nisar	GGHS Janroz Khan Kalay	5139-5197 25-11-2008
19.	Rani Gul	Jan Mohammad	GGHS Doschra	5139-5197 25-11-2008
20.	Menhus Yousaf	Yousaf Khan	GGHS Mandani	5139-5197 16-09-2008
21.	Saima Gul	Amjad Khan	GGHS Shah Afzal Abad	5139-5197 25-11-2008
22.	Nabeed Akhtar	Saif Ur Rahman	GGHS Shah Afzal Abad	
23.	Fatima Bibi	M. Hashmat Ali	GGHS Doulat Pura	5139-5197 25-11-2008
24.	Najma Haq	Zameer Haq	GGHS Kot Baba Tangay	5139-5197 16-09-2008
25.	Shahmaz Kousar	Rahmat Ullah	GGHS Doulat Pura	5139-5197 25-11-2008
26.	Ambareen Majceed	Abdul Majceed	GGMS Gihari Abdullah	5139-5197 25-11-2008
27.	Nargis Sabu	Riaz Khan	GGCMS Tehbanth	5139-5197 16-09-2008

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66
1/10/09
3 (SST)
E

201.	Nighat Zaman	Muhammad Zaman	GGCMHS No. 1	5139-5197 16.9.08
202.	Noshaba Gul	Rehmat Din	GGHS Noordi	5139-5197 25.11.08
203.	Nighat Bibi	Malik Rustain	GGMS Nallah Soha	5139-5197 25.11.08
204.	Roohi Bano	Gulzar Shah	GGHS Pind Kamal Khan	5139-5197 25.11.08

205.	Rubina Almas	Dil Pazeer	GGMS Pind Muncen	5139-5197 16.9.08
206.	Javeria Irshad	Muhammad Arshad	GGHS Serai Fiazat Khan	5139-5197 25.11.08
207.	Atika Gul	Malik Mazhar	GGMS Sherwal	5139-5197 16.11.09
208.	Gul Rehana	Aurangzeb	GGMS Sirikot	5139-5197 16.9.08
209.	Sadia Masroor	Masroor Hussain	GIMPS Vijjian	5139-5197 16.9.09
210.	Ayesha Noreen	Muhammad Yousaf	GGHS Kahal	5139-5197 16.9.08
211.	Noreen Bibi	Ali Gohar	GGHS Dingi	5139-5197 16.9.08

MANSEHRA

212.	Kalsoom Shakir	Irshad Shakir	GGHS Darban	No.1876-88 24-10-08
213.	Amina Begum	Muhammad Parvez	-do-	5139-5197 16-09-08
214.	Faiza Tabassam	Muhammad Younis	-do-	5139-5197 16-09-08
215.	Nadia Nisar	Nisar Ahmad	GGHS Trangri Bala	5139-5197 16-09-08
216.	Saima Noreen	Muhammad Anwar	GGHS Mangloor	5139-5197 25-11-08
217.	Tanzeela Lodhi	Siddique Lodhi	GGHS Dhodial	5139-5197 16-09-08
218.	Adila Chand	Muhammad Aslim	GGHS Shamdhra	5139-5197 25-11-08
219.	Rani Javeria	Muhammad Zahoor	GGHS Shinkiri	5139-5197 16-09-08
220.	Shazia Ghaffar	Abdul Ghafar	GGHS Talhata	5139-5197 16-09-08
221.	Shamshad Bano	Noor Aslam	-do-	5139-5197 16.9.08
222.	Shabana Azeem	Muhammad Azeem	GGHS GGHS	5139-5197 25-11-08
223.	Phool Bibi	Sardar Shah	GGHS Behali	5139-5197 25.11.08
224.	Bibi Sajida Parveen	Muhammad Aslam	GGHS Afzal Abad.	5139-5197 16-09-08
225.	Chaman Ara	Maqbool ur Rehman	GGHS Kaghlan	5139-5197 16.9.08
226.	Bibi Abida	Muhammad Manzoor	-do-	5139-5197 16.9.08
227.	Haleema Shahzadi	Abdur Razaq	GGHS Parhina	5139-5197 16-09-08
228.	Bibi Kalsoom	Mehboor ur Rehman	-do-	5139-5197 16-09-08
229.	Nazia Manzoor	Muhamma Manzoor	-do-	5139-5197 16-09-08
230.	Rahela Anwar	Anwar Khan	-do-	1876-88 24-10-08
231.	Melnaz Shah	Salamat Shah	GGHS Hassa	5139-5197 16-09-08
232.	Fehmina Hina Lodhi	Abdul Hannan Lodhi	GGHS Tassa Nawab.	5139-5197 25-11-08
233.	Amber Jabeen	Muhammad Ajoon Khan	GGHS Atarshisha	5139-5197 25.11.08
234.	Safina Zaman	Ali Zaman	JICA Model Phulra	5139-5197 16-09-08

Fauzan

[Signature]

11/12/08

235.	Samina Naz	Muhammad Irjan	GGCMS Paqir Abad.	5139-5197 25-11-08
236.	Dur-E-Saim	Muhammad Hussain	GGCMS Khulhaary	5139-5197 16-09-08
237.	Abida Zeb SST	Chian Zeb	GGCMS Charah	5139-5197 25-11-08
238.	Barseela Zeb	Aurangzeb	GGMS Thalhi Khurd	5139-5197 16-09-08
239.	Gul Bibi	Haji Akbar	GGMS Chinarkot	5139-5197 25-11-08

240.	Shaista Malik	Muhammad Miskeen	GGMS Mang	5139-5197 25-11-08
241.	Naila Gul	Sarfraz	GGMS Madserian	5139-5197 25-11-08
242.	Nadia Jadoon	Muhammad Younis	GGMS Paras	5139-5197 25-11-08
243.	Bibi Saima	S.Nazir Ahmed Shah	GGMS Morat Mera	5139-5197 25-11-08
244.	Saeeda Bibi	Q.Zaid Haq	GGMS Ahi	5139-5197 16-9-03
245.	Faiza Tabassum	Muhammad Hamyoun	GGMS Agla Gran.	5139-5197 25-11-08
246.	Shazia Nasreen	Abdul Jalil	GGMS Bandgesuch	5139-5197 16-09-08
247.	Naima Sultana	Aminul Haq	GGMS Bajmang.	5139-5197 16-09-08
248.	Sultana Bibi	S.Mehmood Shah	GGMS Hassarai	5139-5197 16-09-08
249.	Zuhra Bibi	Abdul Aziz	GGMS Mahandri	5139-5197 16-09-08
250.	Shaista Bibi	Isa Khan	GGMS Manda Buch	5139-5197 5139-5197 16-09-08
251.	Sadaf Qurat-ul Ain	Atta Muhammad	GGMS Sandasar	5139-5197 16-09-08
252.	Shahida Parveen	Abdul Ghani	GGMS Sangar	5139-5197 16-09-08
253.	Bibi Rabia	Muhammad Fareed	GGMS Maazullah	5139-5197 16-09-08
254.	Humera Gul	Muhammad Daud	GGMS Parian	5139-5197 16-09-08
255.	Aisha Humna	Ghulam Muhammad	GGMS Bandi Saddiq	5139-5197 16-09-08
256.	Sumera Iqbal	Muhammad Iqbal	GGMS Bai Bkujna	5139-5197 16-09-08
257.	Sumera Bibi	Muhammad Parvaiz	GGMS Bhutto Band	5139-5197 16-09-08
258.	Anreena	Muhammad Saleem	GGMS M.B.Kalan	5139-5197 16-09-08
259.	Takia	Muhammad Muskeen	GGMS Nara Doga	5139-5197 16-09-08
260.	Afshan Faiz	Muhammad Faiz	GGMS Sawan Mera	5139-5197 25-11-08
261.	Samina Gul	Mahzoz Khan	GGMS Tarwara	5139-5197 16-9-08
262.	Kalsoom Bibi	Muhammad Ishafaq	GGMS Jisgran	5139-5197 16-09-08
263.	Mehmooza Malik	Muhammad Zubair	GGMS Jehangian	5139-5197 25-11-08
264.	Samina Shahzadi	Taus Khan	GGMS Gali Badral	5139-5197 16-09-08
265.	Aisha Banaras	Muhammad Banaras	GGMS Kawai	5139-5197 25-11-08
266.	Javeria	Ghulam Jalani	-do-	5139-5197 25-11-08
267.	Bibi Mehtab	Naimatullah	-do-	5139-5197 16-09-08
268.	Nighat Rabani	Ghulam Rehman	GGMS L/Nawab	5139-5197 25-11-08

Fuad

11/12/08

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269.	Gulnaz		GGMS Ranikot	5139-5197 25-11-08
270.	Tasleem Yasceen		GGHS Hassan	5139-5197 25-11-08

BATTAGRAM				
271.	Qamarun Nisa	Muhammad Hasham	GGHS Bania	5139-5197 16/09/08
272.	Bibi Alyia	Muhammad Hashan(K)	GGHS Bania	5139-5197 16/09/08
273.	Bibi Fatima	Muhammad Fayez	GGHS Battagram	5139-5197 16/09/08
274.	Sumaira	Noor-ul-Huda	GGHS T.Kharari	5139-5197 16/09/08
275.	Zakia Khan	Muhammad Khan	GGMS Kuza Banda	5139-5197 16/09/08
276.	Nighat Shahna		GGMS Thakote	5139-5197 16/09/08
277.	Shahzia Bibi	Hafiz-ur-Rehman	GGMS Arghashori	5139-5197 16/09/08
278.	Javaria Sakhi	Sakhi Muhamma Tanoli	GGHS Bania	5139-5197 25/11/08
279.	Sajida Sakhi	Sakhi Muhamma Tanoli	GGHS T.Kharari	5139-5197 25/11/08

KOHISTAN				
280.	Asifa Bibi	Muhammad Manzoor	GGMS Chackui	1876-88 24/10/08
281.	Farzana Sanum		GGMS Goli Bagh	1876-88 24/10/08
282.	Sughra Bibi	Muhammad Maskeen	GGHS Dassu Kaloni	1876-88 24/10/08

KARAK				
283.	Shagufta Naz	Abdur Rais	GHSS T/Nasrali	5139-5197 25/11/08
284.	Mchnaz Pari	Hamid Ullah	GGMS Tanga Zanai	5139-5197 16/9/08
285.	Zahida Parveen	Mir Qabiz Khan	GGHS Rahmat Abad	5139-5197 16/9/08
286.	Farida Khanum	W/O Ashraf	GGHS Ghundi Killa	5139-5197 16/9/08
287.	Hussan Bano	Fateh Jang	GGHS Bogara	5139-5197 16/9/08
288.	Binafshad Shulceen	Gul Shajin Shah	GGHS Bogara	5139-5197 16/9/08
289.	Afsar Parveen	Umar Hassan	GGHS Tarki Khel	5139-5197 16/9/08
290.	Musarrat Pari	Rahim Badshah	GGHS Bazid Khel	5139-5197 16/9/08
291.	Fazilat Pari	Anwar Ghani	GGHS Bazid Khel	5139-5197 16/9/08
292.	Robina Shahnaz	Sheer Dad Khan	GGHS Mitha Khel	5139-5197 16/9/08
293.	Tilat Noreen	Allah Yar Gul	GGHS Nari Panos	5139-5197 16/9/08
294.	Samin Khattak	Muhammad Akbar	GGHS Nari panos	5139-5197 16/9/08
295.	Aisha Gul	Maula Jan	GGHS Esak Chountra	5139-5197 16/9/08
296.	Bascerat Begum	W/O Shohab Ullah	GGHS Bahader Khel	5139-5197 16/9/08
297.	Shazia Begum	M. Aslam Khattak	GGCMS Tater Khel	5139-5197 16/9/08
298.	Ullat Ayub	Ayub Khan	GGMS Khawaja Khel	5139-5197 16/9/08
299.	Rukhsana Yasmin	Sar Gul Khan	GGMS Zara Gandi	5139-5197 16/9/08
300.	Shazia Rahim	Abdur Rahim	GGMS Totaki	5139-5197 16/9/08
301.	Musarrat Shaheen	Ilam Dad	GGHSS Chokara	5139-5197 16/9/08

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TERMS & CONDITIONS OF HER APPOINTMENT

- 1- Their services will be considered as regular but without pension & gratuity in terms of Section-19 of the NWFP, Civil Servants Act, 1973 as amended vide NWFP, Civil Servants (Amendment) Act, 2005. They will, however, be entitled to contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
- 2- Their seniority will be determined according to Section-4 of the NWFP, Employees (Regularization of Services) Act, 2009.
- 3- They will be required to furnish copies of all their certificates / degrees alongwith original receipts and photo stat copies thereof, pertaining to the verification fee of the concerned Examining body (Board & University) to the EDOs (E&SE) concerned
- 4- The EDOs (E&SE) concerned are directed not to release their pay until the verification of their documents.

DIRECTOR

Endst: No. 2472-3056 /F.No.A-17/SET(F) Contract- Appoint:2009 Dated Peshawar the 11/12/2009.

- 1- PS to Minister for Elementary & Secondary Education NWFP, Peshwar
- 2- PS to Secretary to Govt. of NWFP, E&SE, Department Peshawar.
- 3- Executive District Officers Elementary & Secondary Education concerned are
- 4- District Account Officer concerned.
- 5- Candidate concerned/Mistress concerned
- 6- PA to Director of Elementary & Secondary Education NWFP, Local Office.

[Signature]
 Deputy Director (Establishment)
 Elementary & Secondary Education NWFP, Peshawar
 11/12/2009
[Signature]

ASMAT
2009/12/12

[Signature]

malafide, illegal against section 4 of KPK (regularization of service) Act 2009 and against the Judgment of Supreme Court of Pakistan Dated 02-06- 2022, Hence in effective upon the rights of the appellant. That the first batch of the SST consisting of 10 candidates were recommended by the KPK (Public Service Commission) on 24-08-2009 (annexed as annexure "C") which is prior to the commencement of KPK (regularization of service) Act 2009 promulgated on 24-10-2009, Hence the appellant ranks senior in service over the employees initially appointed on Adhoc Basis & later on regularized in service (respondent No 4 to respondent No 626).

PRAYER: On acceptance of instant service appeal, the Honorable court may graciously be pleased to pass the order as under:

- a. Declaration to the effect the impugned seniority list of SST updated with on 31-12-2022 issued by respondent No 2 whereby SST initially appointed on Adhoc basis in the year 2006, 2007, 2008 and were later on regularized on 24-10-2009 (respondent No 4 to respondent No 626) under KPK (regularization of service) Ac 2009 have been given seniority over the appellant who was appointed on the recommendation of KPK Public Service Commission is wrong, incorrect, against law and facts, discriminatory, void ab-intio, misuse of authority, malafide, Illegal, against

To

(14)

(D)

Directorate of Elementary & Secondary Edu
K.P.K. Peshawar.

Subject: Request for provision of ^{order} Seniority
List SST Female 31-12-2022 according
to R.T.I.

Respected Sir,

With great respect it is stated that
seniority of SST on line has been filed
before the Service Tribunal K.P.K. Peshawar
Institution branch has to raise objections
to provide seniority list of SST Female
stated on 31-12-2022 and orders

It is therefore requested before the
competent authority to provide the
seniority list according to R.T.I well
in time please.

Thanks

yours Sincerely
Shehbaz Ali SST
G.M.S Tarora
Abbottabad.

884
21-8-23

Dated: 21-08-2023

Rbi

Cell No 0331 9099923
ID No 18101-0351516-8

To

Chairman,
Public Service Commission
K.P.K. Peshawar.

D. NO. 10992

Dated: 16-08-23

Subject, provision of Recommendation
Pcs order

Respected Sir,

with great respect, It is stated
that I had passed the Pcs Exam
vide advertisement No 25-01-2009
for 8ST (S) vide S.No 5. Dated 24-08-2009.
I have filed the Service Appeal against the
Regularized Candidates also 8ST, before
the Service Tribunal Kp Peshawar, for
the Seniority of 8ST.

It is therefore requested that attested/
original above mentioned order have to
Present before the Tribunal with in time,
I shall be obliged for your kindness
as provision of to record concern please

Thanks

Asma Ghaffar 8ST
Q. Q. Com. School ATB
Dated: 12-08-2023

Full On